



Wyoming Department of Agriculture

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February 10, 2006

Jackson Ranger District, Bridger Teton National Forest

Lance Koch

P.O. Box 1689

Jackson, WY 83001

Dear Mr. Koch:

Following are the comments from the Wyoming Department of Agriculture (WDA) on the Jackson Ranger District of the Bridger-Teton National Forest proposal for a large-scale wildlife habitat enhancement to improve declining bighorn sheep and elk winter range habitats within the Lower Gros Ventre area.

Our comments are specific to our mission within state government: dedication to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. As this proposal will have major impacts upon our agriculture industry, our natural resources and the welfare of our citizens, it is important to inform us on proposed actions and decisions so we can continue to express pertinent issues and concerns.

We support the Jackson Ranger District of the Bridger Teton National Forest on the use of prescribed fire for treating vegetation, reducing conifer encroachment, and improve aspen stands. Burning enhances native grass species composition and eliminates the buildup of ground litter. It removes old grass stems, standing vegetation, and ground litter; controls plant diseases, and helps control the spread of exotic plants and woody vegetation.¹ Fire exclusion during the past century has led to increased surface fuels, tree densities, and the continuity of aerial and surface fuels, thereby escalating fire hazard in many forests.² Wildlife will undoubtedly benefit from this burn. We realize the burning project proposed is on federal land and private landowners surrounding the burn areas should expect to experience no hardships, but we offer the following comments for your consideration.

Review Department of Environmental Quality's (DEQ) Chapter 10: Smoke Management

The DEQ Air Quality Division approved and implemented their standards and regulations on April 5, 2005. There are four sections; Section 1, Introduction to smoke management; Section 2, Open burning restrictions; Section 3, Wood waste burners; and Section 4 Smoke management requirements. The document has some specific procedures to follow. We request you consider in particular Section 2(g) (ii)(A), which states "prior to ignition of an open burn, the person or

¹ Massachusetts Audubon Society, "Managing Agricultural Lands for Grassland Birds," Grassland Birds, English (www.massaudubon.org/Birds_&_Beyond/grassland/agricultural.php:6-7-05)

² Carol Miller and Dean L. Urban, "Modeling the Effects of Fire Management Alternatives on Sierra Nevada Mixed-Conifer Forests," Ecological Applications (2000)

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organization conducting the open burn shall communicate burn information to the public by notifying the jurisdictional fire authority(s) responsible for the geographic area in which the open burn is to occur." Also Section 2(g)(ii)(C), "the open burn, except for fence line, irrigation ditch or canal burns, shall only be conducted by at least 500 feet from a population, unless a waiver of this requirement has been granted by the Administrator of the Division. The person or organization conducting the open burn shall document in writing the reasons for requesting the waiver. The Administrator of the Division shall consider such waiver requests on a case-by-case basis." We believe the forest service must be fully aware of how the smoke can cause health problems to the public, especially those private landowners who live near the project area.


Consider long-term results of project

We ask you to consider these same private landowners after the actual burn project is complete. There is a likely chance the wildlife will not inhabit the burned project area for some period of time, which may result in these animals utilizing private property, haystacks, and more. As we are all aware, brucellosis is a major economic impact to the livestock industry. We support the efforts of the brucellosis task force in trying to reduce contact between wildlife and livestock. Should elk and bison move to private property and cause the private landowner concern with the commingling or raiding of haystacks, the Jackson Ranger District along with federal and state wildlife biologists must support the landowner to haze these animals off their property when necessary.

We believe prescribed burning will enhance the Gros Ventre area for wildlife and we support the Jackson Ranger in the effort proposed. Private landowners will additionally support wildlife with open spaces, migration routes, and habitat. We strongly encourage your agency to support the surrounding landowners in the Kelly area and be considerate of their needs, and how the proposed project may affect them.

Thank you for the opportunity to comment.

Sincerely,



John Etchepare
Director

JE/jw

Cc: Governor's Planning Office
Wyoming Stock Growers Association
Wyoming Association of Conservation Districts
Wyoming State Grazing Board
Wyoming Game and Fish Dept.
Rocky Mountain Farmers Union
Wyoming Farm Bureau Federation